

Message

From: Marsh, Karen [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=03408BEA5D5B4030BE80FA390ED47026-MARSH, KARE]
Sent: 10/28/2019 3:02:34 PM
To: Jamie Nease [jnease@hlpengineering.com]
Subject: RE: OOOO/OOOOa compliance questions

Hi Jamie,

Sorry for the delayed response. I checked in with our compliance office on your question. The rule says you are in compliance with applicable OOOO requirements if you do all of the applicable requirements OOOOa. We think this would include reporting. When reporting under OOOOa, you need to identify the affected facility. There isn't a notification requirement but you could make a note in the OOOOa report of what you are doing.

I hope this helps.
Karen

Karen R. Marsh, PE
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-----Original Message-----

From: Jamie Nease <jnease@hlpengineering.com>
Sent: Friday, October 11, 2019 10:20 AM
To: Marsh, Karen <Marsh.Karen@epa.gov>
Subject: OOOO/OOOOa compliance questions

Hey Karen, I'm not sure who best to direct this tom but maybe you can help me out. Under 60.5370(d), it states:

You are deemed to be in compliance with this subpart if you are in compliance with all applicable provisions of subpart OOOOa of this part.

So if I have an affected source under OOOO, if I apply all the requirements in OOOOa to this source, I would be in compliance with OOOO. I am assuming I could also include these sources in my OOOOa report. Would I then no longer have to submit a OOOO report for that source? If I choose to do that, is there a notification required stating that is being done?

Example, I have a reciprocating compressor subject to the requirements of OOOO and annual reports are being submitted in accordance with OOOO. Currently, this compressor is meeting all of the requirements under OOOOa as well. Can I cease reporting under OOOO and just add it to the annual OOOOa report? Is a notification required under OOOO or Subpart A

Thank you!!

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